

Remarks

Status of the Application

Applicants respectfully request reconsideration of the rejections set forth in the Office Action mailed on February 10, 2003. The Examiner has rejected claims 1-5, 11-12, and 14-20 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,226,751 to *Arrow et al.* (*Arrow*). The Examiner has further rejected claims 6-10, 13, and 21-25 under 35 U.S.C. § 103(a) as being unpatentable over *Arrow* in view of U.S. Patent No. 6,366,950 to *Scheussler et al.* (*Scheussler*). Please cancel claim 4 without prejudice. Claims 1-3, and 5-25 are pending in the current application.

The Claims

Rejections Under 35 U.S.C. § 102

A number of claims have been rejected under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent No. 6,226,751 to *Arrow et al.* (*Arrow*). *Arrow* discloses a virtual private network used to couple other virtual private networks over a public network (*see* col. 3, ll. 8-45). In this way, secure communications between members of virtual private networks may be achieved (*see* col. 3, ll.35-37). As such, a processor is configured as a single virtual private network unit in order to control the operation of the operating system (*see* col. 9, ll. 36-40; Figure 7).

In contrast, claim 1 as amended filed teaches a method for defining a virtual domain in an electronic messaging system wherein the virtual domain corresponds “to a real domain name server in a **hierarchically organized directory** wherein the hierarchically organized directory is a hierarchical structure that resembles a tree with one major branch at the top and many branches and sub-branches below.” The arrangement of the tree is flexible, allowing administrators to decide how to best deploy the service for their organization. For some, it may be best to arrange the tree according to the actual business organizational structure or geographic structure. For others, however, a one-to-one mapping to DNS layers may be best (*see* Specification p. 12, ¶ 1). The Examiner has specifically cited that *Arrow* (col. 3, Ll. 30-35) teaches a hierarchically organized directory. Applicants respectfully disagree. *Arrow* discloses an embodiment that includes, “defining address translations rules for virtual private network units coupled to the public data network” (col. 3, ll. 30-35). One skilled in the art would readily recognize that address translation rules are not a hierarchically organized directory as required by claim 1. Thus, Applicants suggest that *Arrow* neither teaches nor suggests a hierarchically organized directory.

Furthermore, the Examiner has asserted that *Arrow* teaches the group object (610) anticipates claim 5, which require further limitations of a hierarchically organized directory. Applicants respectfully disagree. *Arrow* teaches a group object (610) “created for groups of network nodes on a public network (100)” where the group object “includes an identifier for the VPN unit associated with the group and the net/mask pairs the group defines” (col. 9, ll.17-23). Thus *Arrow* does not teach a “hierarchically organized directory” as required by claim 1; nor a tree based hierarchy is a standard based directory information tree (DIT) that includes a plurality of directory entries each of which is associated with a higher level (parent) directory entry” as required by claim 5.

Independent claims 14 and 18 recite substantially the same limitations as does claim 1 and therefore the Applicant contends that claims 14 and 18 are also allowable over the cited art for at least the reasons cited for independent claim 1.

All remaining dependent claims rejected under 35 U.S.C. § 102 (e) depend either directly or indirectly from independent claims 1, 14, or 18 and are therefore also allowable over the cited art for at least the reasons stated for claims 1, 14, or 18.

Rejections Under 35 U.S.C. § 103

A number of claims have been rejected under 35 U.S.C. § 103 (a) as being unpatentable over U.S. Patent No. 6,226,751 to *Arrow* in view of U.S. Patent No. 6,366,950 to *Scheussler et al.* (*Scheussler*).

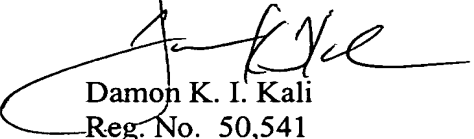
Applicants first note that all claims rejected under 35 U.S.C. § 103(a) depend either directly or indirectly from independent claims 1 or 18. As such, those dependent claims are therefore also allowable over the primary reference, *Arrow*, for at least the same reasons stated for claims 1 or 18. To reiterate, *Arrow* does not teach a “hierarchically organized directory” as required by claims 1 and 18. Furthermore, in this regard, the secondary reference, *Scheussler*, does not cure the deficiency in *Arrow* in that *Scheussler* does not teach a “hierarchically organized directory” as required by claims 1 and 18. Therefore, neither of the references, separately or in combination, discloses or suggests a hierarchically organized directory.

Therefore, the applicants believe that claims 6-10, 13, and 21-25 are neither anticipated nor reasonably suggested by the cited reference and are, accordingly, allowable over the cited art.

Applicants believe that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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